

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

WILLIAM H. OLIVER, JR.  
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WO-7129

In Re:

Vanessa Paramita

Case No.: 17-17567

Judge: CMG

Chapter: 13

**CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION TO**

☒ **CREDITOR'S MOTION or CERTIFICATION OF DEFAULT**

☐ **TRUSTEE'S MOTION or CERTIFICATION OF DEFAULT**

The debtor in the above-captioned chapter 13 proceeding hereby objects to the following  
(choose one):

1. ☒ Motion for Relief from the Automatic Stay filed

by Arthur Slaght, creditor,

A hearing has been scheduled for 06/06/2018, at 9:00 a m.

OR

☐ Motion to Dismiss filed by the Standing Chapter 13 Trustee.

A hearing has been scheduled for \_\_\_\_\_, at \_\_\_\_\_ am.

☐ Certification of Default filed by \_\_\_\_\_, creditor,

I am requesting a hearing be scheduled on this matter.

OR

☐ Certification of Default filed by Standing Chapter 13 Trustee

I am requesting a hearing be scheduled on this matter.

2. I am objecting to the above for the following reasons **(choose one)**:

- ☐ Payments have been made in the amount of \$ \_\_\_\_\_, but have not been accounted for. Documentation in support is attached hereto.
- ☐ Payments have not been made for the following reasons and debtor proposes repayment as follows **(explain your answer)**:

☒ Other **(explain your answer)**:

See attached detailed Certification in Opposition.

3. This certification is being made in an effort to resolve the issues raised by the creditor in its motion.

4. I certify under penalty of perjury that the foregoing is true and correct.

Date: 05/21/2018

/s/ Vanessa Paramita  
Debtor's Signature

Date: \_\_\_\_\_

\_\_\_\_\_  
Debtor's Signature

**NOTE:**

1. This form must be filed with the court and served upon the Standing Chapter 13 Trustee and creditor at least seven (7) days before the return date pursuant to D.N.J. LBR 9013-1(d), if filed in opposition to a *Motion for Relief from the Automatic Stay or Trustee's Motion to Dismiss*.
2. This form must be filed with the court and served upon the Standing Chapter 13 Trustee and creditor within 14 days of the filing of a *Creditor's Certification of Default* (under an *Order Resolving Motion to Vacate Stay and/or Dismiss with Conditions*) or a *Trustee's Certification of Default*.

**If this form is not filed the Motion or Certification of Default will be deemed uncontested and no hearing will be scheduled.**

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| WILLIAM H. OLIVER, JR.<br>2240 Highway 33<br>Suite 112<br>Neptune, New Jersey 07753<br>732-988-1500<br>Attorney for Debtor(s)<br>WO-7129 |   |
| In Re:<br><br>Vanessa Paramita<br><br>Debtors  | Case No.: 17-17567<br><br>Adv. No:<br><br>Hearing Date: 06/06/2018<br><br>Chapter: 13<br><br>Judge: Christine M. Gravelle |

**CERTIFICATION OF DEBTOR IN OPPOSITION TO MOTION FOR STAY RELIEF**

Vanessa Parmita, debtor, hereby certifies and says:

1. I am the debtor in connection with the above matter.
2. I initially filed my bankruptcy in order to get a loan modification or to sell the property if I wasn't able to do so. My ex-husband owns one-half (1/2) an interest in my residence. He also owns a one-half (1/2) an interest in my automobile which he indicated is an "antique" automobile. I believe it does have value over and above what it was originally listed for and may be continuing to be appreciating.
3. I am therefore requesting in my Chapter 13 plan that the vehicle be sold either by a broker to be approved by both parties, that is my ex-husband and myself, or by an auctioneer which we can have appointed to sell the vehicle.

4. One-half (1/2) of the equity would go to me and whatever is non-exempt would go to the Chapter 13 Trustee.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: May 21, 2018

/s/ Vanessa Paramita  
Vanessa Paramita